

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Appellants:	Zhiqiang WANG et al.	§	Confirmation No.:	9275
		§		
Serial No.:	10/667,313	§	Group Art Unit:	2454
		§		
Filed:	09/23/2003	§	Examiner:	Jeong S. Park
		§		
For:	Techniques for Resolving	§	Docket No.:	200309072-1
	Network Connectivity	§		

Entered  
/J.P./  
02/11/2010

**REPLY BRIEF**

**Mail Stop Appeal Brief – Patents**

Date: November 17, 2009

Commissioner for Patents  
PO Box 1450  
Alexandria, VA 22313-1450

Sir:

In response to the Examiner's Answer dated September 17, 2009, Appellants submit this Reply Brief for further consideration by the Board. Appellants repeat their arguments from their principle brief and offer the following additional comments in response to the Examiner's response on pages 9-10 of the Answer.

Claim 1 requires "assigning a second identifier to the portion of the network *based on a domain identifier unique* to other portions of the network." The Examiner states that Gleeson teaches assigning a second identifier that is unique to other portions of the network. Answer, p. 9. However, claim 1 requires assigning a second identifier based on a *domain identifier* that is *unique* to other portions of the network. That is, the *domain identifier* itself must be *unique* to other portions of the network. As the Examiner admits, Gleeson fails to teach a domain identifier at all. Answer, p. 9. Thus, Gleeson fails to teach or suggest a domain identifier that is unique to other portions of the network. While Luke teaches the assigning of a VLAN ID to a VLAN that is associated with a virtual network, Luke does not teach or suggest that this VLAN ID is *unique* to other portions of the network as required by claim 1. (See Luke – para. [0469]). Ishwar fails to teach or suggest this claim limitation as

well. For at least this reason, claim 1 and its dependent claims 2-9 are allowable over Gleeson in view of Ishwar and further in view of Luke.

Moreover, claim 1 also requires, "*modifying* the first identifier associated with the portion of the network to include the second identifier." The Examiner acknowledges that Gleeson fails to teach the modification of the first identifier to include a second identifier. Answer, p. 10. Ishwar only discloses a customer specific VLAN that is identified by a combination of VLAN ID and customer ID. (Ishwar – para. [0026]). However, the VLAN ID of Ishwar is *not modified* at all. Furthermore, no identifier in Ishwar is ever *modified*. Thus, Ishwar fails to teach or suggest this limitation. Luke fails to cure this deficiency. For at least this additional reason, claim 1 and its dependent claims 2-9 are allowable over Gleeson in view of Ishwar and further in view of Luke.

Claims 10, 21, and 27 recite similar limitations as those discussed above. Thus, claims 10, 21, and 27, along with their dependent claims 11-20, 22-26, and 29-30, are allowable over Gleeson in view of Ishwar and further in view of Luke.

For the reasons stated above as well as in Appellants' principle brief, Appellants respectfully submit that the Examiner erred in rejecting all pending claims. It is believed that no extensions of time or fees are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 C.F.R. § 1.136(a), and any fees required (including fees for net addition of claims) are hereby authorized to be charged to Hewlett-Packard Development Company's Deposit Account No. 08-2025.

Respectfully submitted,

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